

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHNNY FLORES, ARIEL GOMEZ and)	
DERRICK LEWIS, for themselves and)	
others similarly situated,)	
)	Case No. 1:20-cv-01128
Plaintiffs,)	
)	Judge Charles R. Norgle, Sr.
v.)	
)	
MOTOROLA SOLUTIONS, INC. and)	
VIGILANT SOLUTIONS, LLC,)	
)	
Defendants.)	

**DEFENDANTS MOTOROLA SOLUTIONS, INC.’S AND VIGILANT SOLUTIONS,
LLC’S MOTION TO COMPEL WRITTEN DISCOVERY FROM PLAINTIFFS**

Defendants, Motorola Solutions, Inc.’s and Vigilant Solutions, LLC (collectively, “Defendants”), move under Federal Rules of Civil Procedure 26, 33, 34, 36 and 37 to compel Plaintiffs to produce information and documents responsive to Defendants’ Interrogatories, Requests for Production of Documents and Requests for Admission, as set forth in the accompanying Memorandum of Law in Support of Defendant’s Motion to Compel Written Discovery from Plaintiffs, and as required by the Federal Rules. This Motion and the accompanying Memorandum seek an Order from this Court that Plaintiffs should be ordered to stop withholding relevant facts and documents, specifically moving:

1. The Court should order plaintiffs to identify, search, and produce ESI. (*See* Memorandum at I.B.)
2. The Court should order plaintiffs to produce discoverable information (*id.* at I.C.):
 - Plaintiffs must produce facts relevant to their allegations and damages (*id.* at I.C.1);
 - Plaintiffs must produce information concerning their prior legal proceedings (*id.* at I.C.2);
 - Plaintiffs must produce information allowing defendants to test the claims that their images are in defendants’ FaceSearch Gallery (*id.* at I.C.3);

- Plaintiffs' must identify communications with other potential class members and non-parties about this case (*id.* at I.C.4); and
- Plaintiffs must produce information concerning the relationship between plaintiffs and their counsel relevant to class certification (*id.* at I.C.5).

Through their Motion and as set forth in the accompanying Memorandum incorporated by reference, Defendants request that the Court order Plaintiffs to identify sources of ESI, search ESI, and produce documents responsive to discovery from ESI consistent with Rule 26; produce documents responsive to Request for Production Nos. 9, 11, 14, 15, 23, 24, answer and supplement their responses to Interrogatory Nos. 1-4, 6-8, 10, 17, 20-22, and admit or deny Flores, Lewis, and Gomez Requests for Admission Nos. 7-9, Flores and Lewis Requests for Admission No. 11, and Gomez Requests for Admission No. 12. Defendants further request that, pursuant to Rule 37(a)(5)(A), the Court award it their reasonable attorneys' fees and costs incurred in connection with this motion.

Dated: September 14, 2021

Respectfully submitted,

DEFENDANTS MOTOROLA SOLUTIONS, INC.
AND VIGILANT SOLUTIONS, LLC

By: /s/ Andrew W. Vail
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Andrew W. Vail, an attorney, hereby certify that, on September 14, 2021, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

By: /s/ Andrew W. Vail
One of Their Attorneys